

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

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**RICHARD JORDAN and RICKY CHASE,**

**Plaintiffs,**

**THOMAS EDWIN LODEN, Jr., ROGER  
THORSON, and ROBERT SIMON,**

**Intervenors,**

**v.**

**BURL CAIN, Commissioner, Mississippi  
Department of Corrections, et al.,**

**Defendants.**

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**Civ. No. 3:15-cv-00295-HTW-LGI**

**JOINT STATUS REPORT ON  
WITNESSES TO BE DEPOSED USING  
ANONYMOUS PROTOCOL**

Counsel for Plaintiffs Richard Jordan and Ricky Chase, together with counsel all Defendants, submit this report regarding the questions posed by the Court in its Scheduling Order of April 1, 2022.<sup>1</sup>

1. The parties have agreed to the following dates for depositions: July 21 and 26, September 7, 8, and 9. Scheduling of the witnesses, counsel for the parties, and the IT professional (Mr. Shorter) does not permit earlier scheduling of these unique depositions.<sup>2</sup>

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<sup>1</sup> Doc. 236.

<sup>2</sup> Counsel for Plaintiffs currently has trials scheduled on July 11, August 1, August 8, and August 22. If any of these trials are continued or settled, the parties have agreed to use the available time to re-schedule the depositions currently set for September 7, 8, and 9.

2. The parties agree that all attorneys will be located in one room during the depositions.

3. Plaintiffs' counsel estimate that two depositions can be conducted per day. A total of seven persons currently identified by pseudonyms have been selected for deposition.<sup>3</sup>

4. Counsel for Plaintiffs and for all Intervenors agree that the presence of the Plaintiffs and Intervenors for the depositions will be waived.

Dated: April 8, 2022.

Respectfully submitted,

/s/ James W. Craig

James W. Craig, MSB # 7798

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<sup>3</sup> MDOC 3, MDOC 4, MDOC 5, MDOC 6, MDOC 7, SE 1, and AG 1.

**CERTIFICATE OF SERVICE**

I hereby certify that I have filed this pleading with the Electronic Case Filing System of the United States District Court for the Southern District of Mississippi and have thereby served all counsel of record for the Defendants and Intervenors in this case.

This, the 8th day of April, 2022.

/s/James W. Craig